

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>BARBARA D. YEAKEL</b>	:	<b>BK. No. 17-13877-ref</b>
<b>Debtor</b>	:	
	:	<b>Chapter No. 13</b>
<b>DEUTSCHE BANK NATIONAL TRUST</b>	:	
<b>COMPANY, AS TRUSTEE FOR AMERIQUEST</b>	:	
<b>MORTGAGE SECURITIES INC., QUEST</b>	:	
<b>TRUST 2006-X1, ASSET BACKED</b>	:	
<b>CERTIFICATES, SERIES 2006-X1</b>	:	<b>11 U.S.C. §362</b>
<b>Movant</b>	:	
<b>v.</b>		
<b>BARBARA D. YEAKEL</b>		
<b>Respondent</b>		

**MOTION OF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR  
AMERIQUEST MORTGAGE SECURITIES INC., QUEST TRUST 2006-X1, ASSET  
BACKED CERTIFICATES, SERIES 2006-X1 FOR RELIEF FROM AUTOMATIC STAY  
UNDER §362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

Movant, by its attorneys, PHELAN HALLINAN DIAMOND & JONES, LLP, hereby requests a termination of Automatic Stay and leave to foreclose on its mortgage on real property owned by Debtor BARBARA D. YEAKEL A/K/A BARBARA YEAKEL and STWEART W. YEAKEL, JR. (deceased).

1. Movant is **DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR AMERIQUEST MORTGAGE SECURITIES INC., QUEST TRUST 2006-X1, ASSET BACKED CERTIFICATES, SERIES 2006-X1.**

2. Debtor, BARBARA D. YEAKEL A/K/A BARBARA YEAKEL and STWEART W. YEAKEL, JR. (deceased) are the owners of the premises located at **1155 MAIN STREET, HELLERTOWN, PA 18055-1318**, hereinafter known as the mortgaged premises.

3. Movant is the holder of a mortgage on the mortgaged premises.

4. Movant wishes to proceed with foreclosure proceedings on the mortgage because of Debtor's failure to make the monthly payment required hereunder.

5. The foreclosure proceedings were stayed by the filing of the instant Chapter 13 Petition.

6. As of March 8, 2018, Debtor has failed to tender post-petition mortgage

months of January 2018 through March 2018 is \$1,012.32 each, less suspense in the amount of \$989.75, for a total amount due of \$2,047.21. The next payment is due on or before April 1, 2018 in the amount of \$1,012.32.

7. Movant, **DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR AMERIQUEST MORTGAGE SECURITIES INC., QUEST TRUST 2006-X1, ASSET BACKED CERTIFICATES, SERIES 2006-X1**, requests the Court award reimbursement in the amount of \$1,031.00 for the legal fees and costs associated with this Motion.

8. Movant has cause to have the Automatic Stay terminated as to permit Movant to complete foreclosure on its mortgage.

9. Movant specifically requests permission from the Honorable Court to communicate with Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law.

10. OCWEN LOAN SERVICING, LLC services the underlying mortgage loan and note for the property referenced in this Motion for Relief for **DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR AMERIQUEST MORTGAGE SECURITIES INC., QUEST TRUST 2006-X1, ASSET BACKED CERTIFICATES, SERIES 2006-X1** (the noteholder) and is entitled to proceed accordingly. Should the Automatic Stay be lifted and/ or set aside by Order of this Court or if this case is dismissed or if the debtor obtains a discharge and a foreclosure action is commenced or recommenced, said foreclosure action will be conducted in the name of **DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR AMERIQUEST MORTGAGE SECURITIES INC., QUEST TRUST 2006-X1, ASSET BACKED CERTIFICATES, SERIES 2006-X1** (the noteholder). **DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR AMERIQUEST MORTGAGE SECURITIES INC., QUEST TRUST 2006-X1, ASSET BACKED CERTIFICATES, SERIES 2006-X1** (the noteholder) has the right to foreclose because Noteholder is the original mortgagee or beneficiary or assignee of the security instrument for the referenced loan.

is either made payable to Noteholder or has been duly endorsed.

**WHEREFORE**, Movant respectfully requests that this Court enter an Order;

a. modifying the Automatic Stay under Section 362 with respect to **1155 MAIN STREET, HELLERTOWN, PA 18055-1318** (as more fully set forth in the legal description attached to the Mortgage of record granted against the Premises), as to allow Movant, its successors and assignees, to proceed with its rights under the terms of said Mortgage; and

b. Movant specifically requests permission from this Honorable Court to communicate with Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law; and

c. Granting any other relief that this Court deems equitable and just.

/s/ Thomas Song, Esquire  
Thomas Song, Esq., Id. No.89834  
Phelan Hallinan Diamond & Jones, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
Phone Number: 215-563-7000 Ext 31387  
Fax Number: 215-568-7616  
Email: Thomas.Song@phelanhallinan.com

April 12, 2018